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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ERIC RAMIREZ,
aka "Drako,"

Defendant.

CRIMINAL INDICTMENT

Case No.: 2:23-cr-0151-APG-NJK

VIOLATIONS:

18 U.S.C. §§ 922(a)(1)(A), 923(a) and
924(a)(1)(D) – Engaging in the Business of
Dealing or Manufacturing Firearms Without
a License

18 U.S.C. § 933(a)(1) and (b) – Trafficking in
Firearms

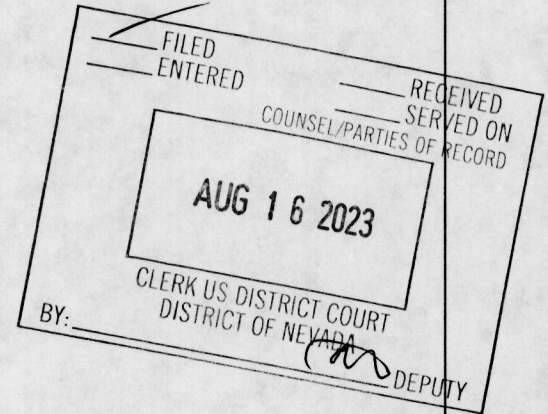
18 U.S.C. § 922(o) and 924(a)(2) – Illegal
Possession or Transfer of a Machinegun

21 U.S.C. § 841(a)(1) and (c) – Distribution
of a Controlled Substance (Fentanyl)

21 U.S.C. § 841(a)(1) and (b)(1)(B)(vi) –
Distribution of a Controlled Substance
(Fentanyl)

THE GRAND JURY CHARGES THAT:

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COUNT ONE

Engaging in the Business of Dealing or Manufacturing Firearms Without a License
(18 U.S.C. §§ 922(a)(1)(A), 923(a) and 924(a)(1)(D))

Beginning on or about June 8, 2023, and continuing up to and including on or about August 3, 2023, in the State and Federal District of Nevada,

ERIC RAMIREZ,
aka "Drako,"

defendant herein, not being a licensed dealer and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in and manufacturing firearms, all in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

Trafficking in Firearms
(18 U.S.C. §§ 933(a)(1) and (b))

Beginning on or about June 23, 2023, and continuing up to and including on or about August 3, 2023, in the State and Federal District of Nevada,

ERIC RAMIREZ,
aka "Drako,"

defendant herein, knowingly transported, transferred, caused to be transported, and otherwise disposed of firearms to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of said firearms by the recipient would constitute a felony, as defined in 18 U.S.C. § 932(a), all in violation of Title 18, United States Code, Section 933.

COUNT THREE

Illegal Possession or Transfer of a Machinegun
(18 U.S.C. § 922(o) and 924(a)(2))

Beginning on or about June 23, 2023, and continuing up to and including on or about August 3, 2023, in the State and Federal District of Nevada,

1 **ERIC RAMIREZ,**
2 **aka "Drako,"**

3 defendant herein, did knowingly possess and transfer a machinegun,
4 conversion devices used to modify a Glock semi-automatic firearm to fire as a fully
5 automatic weapon, enabling said firearm to automatically shoot more than one shot,
6 without manual reloading, by a single function of the trigger, all in violation of Title 18,
7 United States Code, Sections 922(o) and 924(a)(2).

8 **COUNT FOUR**

9 *Distribution of a Controlled Substance (Fentanyl)*
10 (21 U.S.C. § 841(a)(1) and (c))

11 On or about June 16, 2023, in the State and Federal District of Nevada,

12 **ERIC RAMIREZ,**
13 **aka "Drako,"**

14 defendant herein, knowingly and intentionally distributed a mixture and substance
15 containing a detectible amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
16 propenamide (fentanyl), a Schedule II controlled substance, all in violation of Title 21,
17 United States Code, Sections 841(a)(1) and (c).

18 **COUNT FIVE**

19 *Distribution of a Controlled Substance (Fentanyl)*
20 (21 U.S.C. § 841(a)(1) and (c))

21 On or about June 27, 2023, in the State and Federal District of Nevada,

22 **ERIC RAMIREZ,**
23 **aka "Drako,"**

24 defendant herein, knowingly and intentionally distributed a mixture and substance
containing a detectible amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propenamide (fentanyl), a Schedule II controlled substance, all in violation of Title 21,
United States Code, Sections 841(a)(1) and (c).

COUNT SIX

Distribution of a Controlled Substance (Fentanyl)
(21 U.S.C. § 841(a)(1) and (b)(1)(B)(vi))

On or about July 10, 2023, in the State and Federal District of Nevada,

ERIC RAMIREZ,
aka "Drako,"

defendant herein, knowingly and intentionally distributed 40 grams or more of a mixture and substance containing a detectible amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vi).

COUNT SEVEN

Distribution of a Controlled Substance (Fentanyl)
(21 U.S.C. § 841(a)(1) and (b)(1)(B)(vi))

On or about July 26, 2023, in the State and Federal District of Nevada,

ERIC RAMIREZ,
aka "Drako,"

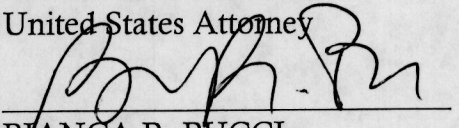
defendant herein, knowingly and intentionally distributed 40 grams or more of a mixture and substance containing a detectible amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vi).

DATED: this 16th day of August, 2023.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON
United States Attorney



BIANCA R. PUCCI
Assistant United States Attorney